

EXHIBIT 1

February 02, 2023

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

STEVEN GILLMAN, as Personal
Representative of the ESTATE
OF MEGAN ANN MILLER, Deceased,
Plaintiff,

vs.

Case No. 21:12762

Hon. Kimberly G. Altman

CITY OF TROY and JULIE GREEN-HERNANDEZ,
Defendants.

/

The Remote Deposition of
PSA JULIE GREEN-HERNANDEZ,
Remote Proceeding,
Commencing at 12:18 p.m.,
Thursday, February 2, 2023,
Before Sabrina Smith, CSR-2129.

February 02, 2023

1 cell waiting for backup: One of the reasons, I think,
2 and I don't want to put words in your mouth, but was
3 that if someone were to commit suicide while two PSAs
4 were in the cell, that would be a concern, correct?

5 A. Correct.

6 Q. Are there any other concerns that you're aware of with
7 respect to why you'd need to wait for backup?

8 A. Because a lot of times if somebody is out of it and
9 then they come back, sometimes they'll be combative,
10 not because they're being mean, but just because
11 they're disoriented, they don't know what's going on
12 and they become disoriented, they start fighting and
13 if we're both in the cell fighting, there's nobody
14 down to help us.

15 Q. If I use the term possum, does that mean anything?

16 A. Yes.

17 Q. What does than mean?

18 A. That means that they're pretending to be sick so
19 you'll go in there and they'll attack you and that's
20 one of the concerns.

21 Q. Is that one of the concerns you would have for
22 immediately going into the cell, is somebody playing
23 possum?

24 A. Yes. I didn't know how to properly say that but, yes,
25 that would be another one.